



California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Cal/EPA Secretary

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Arnold Schwarzenegger
Governor

October 5, 2010

Mr. James Stull
Continental Heat Treating
10643 Norwalk Boulevard
Santa Fe Springs, CA 90670

REQUIREMENT TO SUBMIT A REVISED WORK PLAN TO CONDUCT ADDITIONAL SUBSURFACE INVESTIGATION PURSUANT TO CALIFORNIA WATER CODE SECTION 13267 ORDER – CONTINENTAL HEAT TREATING, 10643 SOUTH NORWALK BOULEVARD, SANTA FE SPRINGS (SCP NO. 1057, SITE ID NO. 204GW00)

Dear Mr. Stull:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the State regulatory agency responsible for protecting water quality in Los Angeles and Ventura Counties. To accomplish this, the Regional Board issues investigative orders authorized by Porter Cologne Water Quality Control Act (California Water Code [CWC], Division 7). The Regional Board issued a CWC section 13267 Order to you dated May 5, 2010 (Order), indicating that soil, soil-gas and groundwater investigation is needed to delineate the lateral and vertical extent of contamination at the subject site (Site). In response to the Order, your consultant, Fero Environmental Engineering, Incorporated (Fero), prepared and submitted the document *Soils Investigation Workplan* (Work Plan), dated August 23, 2010.

The Work Plan proposes a site-wide soil-gas survey at 26 locations in and around the on-Site building where the former degreaser was located. Soil-gas samples will be collected from these borings at a depth of 5 feet below ground surface (bgs). Soil-gas samples will also be collected at depths of 5, 15, 30, 45, and 60 feet bgs from an existing multi-depth nested probe located in close proximity to the former degreaser location. The soil-gas samples will be analyzed by an on-Site mobile laboratory for volatile organic compounds (VOCs). In addition, soil samples will be collected from 15 of the 26 borings at 5 feet bgs and analyzed for VOCs and total petroleum hydrocarbons (TPH) in 8 samples and TPH only in the remaining 7 samples. With regard to the required groundwater investigation, Fero has submitted a report detailing the installation and sampling of three on-Site groundwater wells under separate cover. Regional Board staff will provide comments on the groundwater investigation report at a later time.

Following our review of the Work Plan and other file documents, we have the following comments and requirements:

1. Regional Board staff have determined that the subsurface investigation proposed in the Work Plan will not adequately delineate contamination in soil and soil-gas at previously identified impacted and/or source areas at the Site. The proposed 5-foot deep soil and soil-gas samples will provide current data to evaluate impact to shallow soil and can be used for completion of an indoor air intrusion evaluation at the Site. However, previous soil and soil-gas investigations indicate that multiple on-Site areas have been impacted to depths greater than 5 feet bgs by VOCs and TPH. These identified impacted areas must be investigated at this time to determine the lateral and vertical extent of contamination. In addition, areas where chemicals were used

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and/or handled as part of routine operations at the Site must be investigated to determine if subsurface impact has occurred.

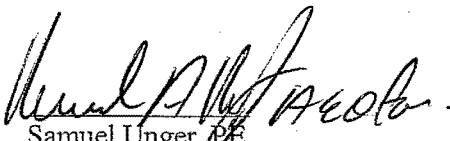
2. According to the Work Plan, the eight soil samples to be analyzed for VOCs are located along the northern property boundary. Based on the wide-spread distribution of VOCs detected during previous sampling events in the upper soils at the Site, you are required to analyze all samples to be collected at the proposed boring locations and sampling depths for VOCs and TPH in soil. Furthermore, considering the Site's long history of industrial operations (from 1969 to the present), and because the property has not been screened for metals contamination to date, all borings must be screened for metals impact, including hexavalent chromium, at the first proposed soil sampling depth.
3. The Work Plan did not include a Site health and safety plan (HASP) for the proposed field investigation. Please submit a copy of the HASP to the Regional Board with the revised work plan for the proposed fieldwork.

You are required to address the Regional Board staff comments described above, and submit a revised Work Plan to the Regional Board by **November 30, 2010**, for our review and approval.

The requirement to submit the above technical report is an amendment to the existing CWC section 13267 Order issued by this Regional Board on May 5, 2010. Pursuant to section 13268 of the CWC, failure to submit the required technical report by the specified due date may result in civil liability administratively imposed by the Regional Board in an amount up to one thousand dollars (\$1,000) per day for every day the report is not received.

If you have any questions, please contact the project manager Mr. David Young at (213) 576-6733 or via email at dyoung@waterboards.ca.gov.

Sincerely,


Samuel Unger, PE
Executive Officer

cc: Mr. Michael A. Francis, Demetriou, Del Guercio, Springer & Francis, LLP
Mr. Bob Schneider, Trilogy Regulatory Services
Mr. Rick Fero, Fero Environmental Engineering, Incorporated

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